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March 9, 2021

Via ECF

The Honorable Richard J. Sullivan
United States Second Circuit Judge,
sitting by designation in the United States District Court
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Josue Vega v. Trinity Realty Corp., et al., Docket No.: 1:14-cv-07417-RJS

Dear Judge Sullivan:

As your Honor knows, we represent Plaintiff Josue Vega in the above-referenced action for violations of the Fair Labor Standards Act and New York Labor Law, for which a default judgment was entered against Defendants Trinity Realty Corp. and Philip Phan, individually, on March 6, 2015. *See* Dkt. No. 16. Pursuant to the Court's Opinion & Order dated February 24, 2021, the party's deadline to submit a joint letter concerning the forthcoming hearing is March 10, 2021. As a result of noticeable progress in our most recent settlement discussions between the parties, we write now - - jointly with Defendants' - - to request a thirty-day extension to April 9, 2021 to file the joint letter regarding the hearing or, in the alternative, to take the steps necessary to notify the Court of a settlement in this matter. This is the parties first request for an extension of this deadline.

We thank the Court for its time and attention to this matter.

IT IS HEREBY ORDERED THAT the parties' request for an extension is GRANTED. The parties shall submit a joint letter that conforms to the instructions set forth in the Court's February 24, 2021 Opinion and Order by April 9, 2021.

Respectfully submitted,

Michael J. Borrelli, Esq.

For the Firm

SO ORDERED: ______ Dated: March 9, 2021

RICHARD J. SULLIVAN U.S.C.J., Sitting by Designation